

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Penn Engineering & Manufacturing  
Corp.

Plaintiff,

v.

Pemco Hardware, Inc., Dongguan  
Fenggang Pemco Hardware Factory,  
and Shenzhen Pemco Fastening Systems  
Co., Ltd.,

Defendants.

No.: \_\_\_\_\_

**Motion For Preliminary Injunction**


Plaintiff, Penn Engineering & Manufacturing Corp. ("PennEngineering"), by and through its undersigned counsel, hereby moves this Court for an Order, pursuant to Fed.R.Civ.P. 65(a) and 35 U.S.C., enjoining Defendants from infringing and diluting 17 of PennEngineering's federally-registered and common law trademarks, and infringing 5 of PennEngineering's U.S. patents, all identified in PennEngineering's proposed Preliminary Injunction Order and supporting memorandum and exhibits, until a final hearing and determination of the merits in this action. Unless and until Defendants are restrained and enjoined by Order of this Court, PennEngineering will suffer immediate and irreparable harm, injury, loss and damage, as described more fully in the complaint, accompanying memorandum of law, and accompanying declaration. PennEngineering has no adequate remedy at law. Prior to the issuance of the annexed proposed order, PennEngineering is ready, willing and able to execute a bond payable to Defendants, or provide other security in such sum as this Court deems proper for such costs and damages, if any, as may be incurred or suffered by any party found to have been wrongfully enjoined or restrained.

WHEREFORE, PennEngineering respectfully requests that this Court enter the annexed proposed order.

Respectfully submitted,

Ryder, Lu, Mazzeo & Konieczny LLC

Date: November 20, 2015


By:   
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Attorneys for Penn Engineering & Manufacturing Corp.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Plaintiff's Motion for Preliminary Injunction, Memorandum of Law in Support of Motion for Preliminary Injunction, Proposed Preliminary Injunction Order, Declaration of Leon Attarian, and Exhibits In Support of Plaintiff's Complaint and Motion for Preliminary Injunction are being served on defendants Pemco Hardware, Inc., Shenzhen Pemco Fastening Systems Co., Ltd., and Dongguan Fenggang Pemco Hardware Factory at 1933 West 11<sup>th</sup> Street, Unit F, Upland, California 91786, by hand delivery concurrently with service of the above-captioned Complaint by professional process server on the date and in the manner indicated in the Proof of Service to the Complaint.

Dated: November 20, 2015

  
Joseph M. Konieczny, Sr.